

EXHIBIT 12

| Name | Services | Hourly Rate | FY96 Invoiced Amount | FY97 Invoiced Amount to date | FY98 Invoiced Amount to date | Total Invoiced Amount to date |
|----------------------|---------------------------|------------------------------|----------------------|------------------------------|------------------------------|-------------------------------|
| Andrews, Nancy | CDFI Reviewer | (4/23/96 - 5/31/97) \$125.00 | \$ 88,331.90 | \$ 137,872.01 | \$ 1,862.00 | \$ 228,065.91 |
| | Management Consulting | (6/1/97 - 1/31/98) \$133.00 | | | | |
| Bard, Don | Grants Management | \$ 52.50 | | \$ 25,013.10 | | \$ 25,013.10 |
| Campbell, Candace | CDFI Reviewer | \$ 100.00 | | \$ 29,841.51 | | \$ 29,841.51 |
| Carpenter, Janney | Micro Enterprise Reviewer | \$ 125.00 | | \$ 37,390.76 | | \$ 37,390.76 |
| Clark, Jim | CDFI Reviewer | \$ 100.00 | \$ 17,266.33 | \$ 24,836.02 | \$ 1,687.00 | \$ 43,789.35 |
| Clark, Peggy | Micro Enterprise Reviewer | \$ 75.00 | | \$ 8,000.00 | | \$ 8,000.00 |
| Condit, Thomas | CDFI Reviewer | \$ 125.00 | | \$ 42,621.28 | \$ 10,437.50 | \$ 53,058.78 |
| Davidson, Steven | CDFI Reviewer | \$ 125.00 | | \$ 34,214.89 | \$ 2,625.00 | \$ 36,839.89 |
| Devine, Richard | CDFI Reviewer | \$ 185.00 | | \$ 42,834.06 | | \$ 42,834.06 |
| Feit, Ronnie | Micro Enterprise Reviewer | \$ 75.00 | | \$ 7,505.57 | | \$ 7,505.57 |
| Feldman, Liz | BEA Reviewer | (6/1/96 - 5/26/97) \$35.00 | \$10,648.41 | \$42,566.04 | \$1,386.00 | \$ 54,600.45 |
| | CDFI Reviewer | (5/27/97 - 10/31/97) \$42.00 | | | | |
| Friedman, Robert | Micro Enterprise Reviewer | \$ 125.00 | \$ 750.00 | \$ 4,452.34 | | \$ 5,202.34 |
| Galvin, Brandee | Micro Enterprise Reviewer | \$ 100.00 | \$ 2,925.00 | | | \$ 2,925.00 |
| Geller, Anna | CDFI Reviewer | \$ 80.00 | | \$ 12,379.57 | | \$ 12,379.57 |
| Gogol, Pamela | CDFI Reviewer | \$ 150.00 | | \$ 6,461.40 | | \$ 6,461.40 |
| Grove, Vickie | CDFI Reviewer | \$ 75.00 | | \$ 18,831.06 | | \$ 18,831.06 |
| Hanson, Daniel | CDFI Reviewer | \$ 120.00 | | \$ 10,174.00 | | \$ 10,174.00 |
| Hanson, Warren | CDFI Reviewer | \$ 120.00 | | \$ 27,519.10 | | \$ 27,519.10 |
| Hershey, Stuart | CDFI Reviewer | \$ 85.00 | | \$ 1,360.00 | | \$ 1,360.00 |
| Isimbabi, Michael | CDFI Reviewer | \$ 95.00 | | \$ 3,098.33 | | \$ 3,098.33 |
| Keeley, Kathryn | Micro Enterprise Reviewer | \$ 106.25 | \$ 4,691.00 | | | \$ 4,691.00 |
| Klein, Joyce | CDFI Reviewer | (2/29/96 - 5/26/97) \$75.00 | \$ 54,500.43 | \$ 119,269.20 | \$ 9,500.00 | \$ 183,269.63 |
| | Management Consulting | (5/27/97 - 7/30/97) \$80.00 | | | | |
| | | (8/1/97 - 1/31/98) \$100.00 | | | | |
| Krassner, Marsha | CDFI Reviewer | \$ 125.00 | \$ 60,180.51 | | | \$ 60,180.51 |
| Krassner, Peter | CDFI Reviewer | \$ 125.00 | | \$ 37,390.56 | \$ 6,249.62 | \$ 43,640.18 |
| Levere, Andrea | Micro Enterprise Reviewer | \$ 106.38 | \$ 850.00 | \$ 6,650.00 | | \$ 7,500.00 |
| Lopez, Dan | CDFI Reviewer | \$ 95.00 | \$ 52,487.50 | \$ 5,072.06 | | \$ 57,559.56 |
| McKee, Kate | Micro Enterprise Reviewer | \$ 62.50 | \$ 3,514.92 | \$ 1,505.13 | | \$ 5,020.05 |
| McQueen, Kevin | CDFI Reviewer | \$ 68.75 | | \$ 1,650.00 | | \$ 1,650.00 |
| Mister, Melvin | CDFI Reviewer | \$ 87.50 | | \$ 11,431.18 | | \$ 11,431.18 |
| Morgan, Grace | Communication Consulting | (Apr 97) \$125.00 | | \$ 95,863.00 | \$ 5,862.50 | \$ 101,725.50 |
| | Management Consulting | (May 97 - Jan 98) \$166.00 | | | | |
| Newberg, Jeremy | CDFI Reviewer | \$ 85.00 | | \$ 2,353.50 | | \$ 2,353.50 |
| Newell, Jamie | CDFI Reviewer | \$ 100.00 | | \$ 5,995.00 | | \$ 5,995.00 |
| Okagaki, Alan | CDFI Reviewer | \$ 100.00 | \$ 32,117.17 | \$ 9,025.73 | | \$ 41,142.90 |
| Paquet, Jim | CDFI Reviewer | (Jan 96 - July 96) \$44.75 | \$ 58,833.21 | \$ 11,995.04 | | \$ 70,828.25 |
| | CDFI Reviewer | (Aug 96 - May 98) \$125.00 | | | | |
| Pryde, Paul | CDFI Reviewer | \$ 137.50 | \$ 45,100.00 | \$ 29,894.67 | \$ 2,570.13 | \$ 77,564.80 |
| Reese, David | CDFI Reviewer | \$ 75.00 | | \$ 24,445.92 | \$ 2,470.00 | \$ 26,915.92 |
| Rico, Christine | BEA Reviewer | (9/30/96 - 5/15/97) \$68.75 | \$ 8,868.75 | \$ 42,120.52 | \$ 2,250.00 | \$ 53,239.27 |
| | Management Consulting | (5/16/97 - 10/31/97) \$75.00 | | | | |
| Russell, Laura Henze | CDFI Reviewer | \$ 100.00 | \$ 28,734.23 | | | \$ 28,734.23 |
| Salzman, Lisa | BEA Reviewer | \$ 56.67 | | \$ 24,948.96 | \$ 3,201.86 | \$ 28,150.82 |
| Sandquist, Morgan | CDFI Reviewer | \$ 150.00 | | \$ 25,951.00 | | \$ 25,951.00 |
| Schumpert, Tom | CDFI Reviewer | \$ 80.00 | | \$ 2,014.74 | | \$ 2,014.74 |
| Severns, Gene | Micro Enterprise Reviewer | \$ 50.00 | \$ 4,271.13 | | | \$ 4,271.13 |
| Siegel, Beth | CDFI Reviewer | \$ 125.00 | | | | \$ - |
| Silvis, Terri | CDFI Reviewer | \$ 80.00 | | \$ 11,040.25 | | \$ 11,040.25 |
| Squier, Gary | CDFI Reviewer | \$ 100.00 | | \$ 2,150.44 | | \$ 2,150.44 |
| Sykes, Christopher | Micro Enterprise Reviewer | \$ 45.00 | | \$ 3,892.00 | | \$ 3,892.00 |
| Tansey, Charles | CDFI Reviewer | \$ 85.00 | | \$ 29,311.56 | \$ 2,826.25 | \$ 32,137.81 |
| Turner, Robert | CDFI Reviewer | NAD Bank Employee | | | | \$ - |
| Van Vliet, Margaret | CDFI Reviewer | \$ 65.00 | | \$ 7,700.29 | \$ 813.05 | \$ 8,513.34 |
| Vandusias, Julia | Micro Enterprise Reviewer | \$ 65.00 | \$ 4,891.25 | \$ 38,942.19 | | \$ 43,833.44 |
| | BEA Reviewer | | | | | |
| Weiser, John | CDFI Reviewer | \$ 150.00 | | \$ 32,039.27 | \$ 4,800.00 | \$ 36,839.27 |
| TOTAL | | | \$ 478,961.74 | \$1,099,623.25 | \$ 58,540.91 | \$ 1,637,125.90 |

EXHIBIT 13

From: WES FRENCH
To: DOM11.DOPO3.JONESD
Date: 5/30/97 7:22pm
Subject: Request for Specific Travel

It has come to my attention that the CDFI Fund has requested specific travel authorization for a consultant of NAMS. Kirsten Moy has requested that Nancy Andrews be allowed to travel to and from Washington DC at the discretion of the program office. In addition, Ms. Andrews has requested reimbursement for the rental of a studio unit in lieu of hotel lodging, due to the number of trips she takes. It is a cost benefit to the government to provide the long term lodging rather than use hotels.

Below is a breakdown of costs and hours associated with Ms. Andrews' invoices to the CDFI Fund since Jan 2 - Apr 27, 1997:

| INVOICE PERIOD: | HOURS: | COST: | TRAVEL: | COST: |
|-----------------|--------|----------|----------------------|------------|
| Jan 2 - Feb 11 | 111 | \$13,875 | 4 nights lodging | \$3,093.06 |
| | | | 5 round trip tickets | |
| | | | 4 days of per diem | |
| | | | 44 cab rides | \$578.57 |
| Mar 6 - Mar 31 | 109 | \$13,625 | 1 night lodging | \$1,864.33 |
| | | | 4 round trip tickets | |
| | | | 6 days of per diem | |
| | | | 26 cab rides | \$325.00 |
| Apr 1 - Apr 27 | 79 | \$9,875 | 0 lodging | \$1,764.00 |
| | | | 5 round trip tickets | |
| | | | 6 days of per diem | |
| | | | 21 cab rides | \$305.00 |

In conversations with Ms. Andrews, she has indicated that the program office has requested that she is made available two times per week.

Therefore, this request is as follows:

- 1) Ms. Andrews be allowed to travel at the request of the program office; and,
- 2) Ms. Andrews temporary quarters are paid for.

Please advise me on your decision as soon as possible, as for work is in progress at this time.

METRICA TASK ORDER #38
TRAVEL COST ANALYSIS

| Task Order No. | Invoice # | Sub-Contractor | Travel Amount (\$) |
|-------------------|-----------|---------------------------|-----------------------|
| #38 | 3038-01 | Krassner, Marsha | \$214.62 |
| #38 | 3038-02 | Capital Access Group, LLC | \$775.82 |
| #38 | 3038-03 | Andrews, Nancy O. | \$2,684.33 |

INDIVIDUAL PURCHASE ORDERS
TRAVEL COST ANALYSIS

| Order No. | Company | NTE* | Name of Consultant |
|--------------------|------------------------------|------------|---------------------|
| DO-96-0304 | Grants Management Associates | \$2,600.00 | Laura Henze Russell |
| DO-97-0284 | Don Bard | \$2,123.01 | |
| DO-96-0296 | Daniel B. Lopez | \$2,960.00 | |
| DO-96-0289 | James Clark | \$2,500.00 | |
| DO-96-0286 | Joyce Klein | \$1,600.00 | |
| DO-96-0279 | Alan Okagaki | \$3,400.00 | |
| DO-96-0278 | Marsha D. Krassner | \$3,000.00 | |
| DO-96-0277 | Nancy O. Andrews | \$2,000.00 | |
| Total: \$20,183.01 | | | |

* The amounts shown represent the Travel not-to-exceed amounts. The amounts shown are unaudited.

**KEVRIC DELIVERY ORDER
TRAVEL COST ANALYSIS**

| Delivery Order No. | Invoice # | Sub-Contractor | Travel Amount (\$)* |
|-------------------------------|------------------|-------------------------|--------------------------------|
| DO-96-0416 (Task 1) | 21 | Andrews, Nancy O. | \$4,256.95 |
| DO-96-0416 (Task 1) | 37 | Andrews, Nancy O. | \$5,851.90 |
| DO-96-0416 (Task 1) | 2 | Andrews, Nancy O. | \$19.50 |
| DO-96-0416 (Task 1) | 6 | Andrews, Nancy O. | \$1,800.50 |
| DO-96-0416 (Task 1) | 9 | Andrews, Nancy O. | \$926.10 |
| DO-96-0416 (Task 1) | 40 | Andrews, Nancy O. | \$2,055.00 |
| Total: | | | \$14,909.95 |
| DO-96-0494 (Task 3) | 13 | Bretz Carpenter, Janney | \$225.23 |
| DO-96-0494 (Task 3) | 10 | Bretz Carpenter, Janney | \$1,462.00 |
| DO-97-0248 (Task 7) | 34 | Bretz Carpenter, Janney | \$1,554.71 |
| DO-96-0248 (Task 7) | 36 | Bretz Carpenter, Janney | \$141.48 |
| DO-97-0248 (Task 7) | 41 | Bretz Carpenter, Janney | \$23.48 |
| DO-96-0494 (Task 3) | 7 | Bretz Carpenter, Janney | \$103.45 |
| DO-96-0494 (Task 3) | 5 | Bretz Carpenter, Janney | \$1,235.82 |
| Total: | | | \$4,746.17 |
| DO-96-0494 (Task 3) | 10 | Clark, Peggy | \$12.50 |
| Total: | | | \$12.50 |
| DO-96-0494 (Task 3) | 16 | Feit, Rona | \$48.59 |
| Total: | | | \$48.59 |
| DO-96-0539 (Task 5) | 11 | Feldman, Elizabeth | \$25.91 |
| DO-96-0416 (Task 1) | 21 | Feldman, Elizabeth | \$12.00 |
| Total: | | | \$37.91 |
| DO-96-0494 (Task 3) | 13 | Freeman, Robert | \$458.79 |
| DO-97-0248 (Task 7) | 41 | Freeman, Robert | \$791.41 |
| Total: | | | \$1,250.20 |
| DO-96-0494 (Task 3) | 10 | Keeley, Kathryn S. | \$441.00 |
| Total: | | | \$441.00 |
| DO-96-0494 (Task 3) | 16 | Levere, Andrea | \$5.80 |
| Total: | | | \$5.80 |
| DO-97-0248 (Task 7) | 44 | McKee, Katherine | \$602.35 |
| DO-96-0494 (Task 3) | 13 | McKee, Katherine | \$340.06 |
| DO-96-0494 (Task 3) | 10 | McKee, Katherine | \$108.67 |
| DO-97-0248 (Task 7) | 46 | McKee, Katherine | \$52.72 |
| DO-96-0494 (Task 3) | 7 | McKee, Katherine | \$407.00 |

**KEVRIC DELIVERY ORDER
TRAVEL COST ANALYSIS**

| Delivery Order No. | Invoice # | Sub-Contractor | Travel Amount (\$)* |
|-------------------------------|------------------|-----------------------|--------------------------------|
| DO-96-0494 (Task 3) | 5 | McKee, Katherine | \$461.00 |
| Total: | | | \$1,971.80 |
| DO-96-0416 (Task 1) | 45 | Okagaki, Alan | \$934.75 |
| Total: | | | \$934.75 |
| DO-96-0494 (Task 3) | 10 | Severens, Eugene | \$508.63 |
| DO-96-0494 (Task 3) | 7 | Severens, Eugene | \$652.00 |
| Total: | | | \$1,160.63 |
| DO-97-0248 (Task 7) | 36 | Sikes, Christopher | \$485.50 |
| DO-96-0494 (Task 3) | 10 | Sikes, Christopher | \$107.12 |
| DO-96-0494 (Task 3) | 7 | Sikes, Christopher | \$454.00 |
| DO-96-0494 (Task 3) | 5 | Sikes, Christopher | \$604.00 |
| Total: | | | \$1,650.62 |
| DO-97-0248 (Task 7) | 23 | Vindasius, Julia | \$13.79 |
| DO-97-0248 (Task 7) | 29 | Vindasius, Julia | \$49.19 |
| Total: | | | \$62.98 |

* The travel amounts are unaudited.

**NAMS DELIVERY ORDER
TRAVEL COST ANALYSIS**

| Delivery Order No. | Voucher # | Sub-Contractor | Travel Amount (\$)* |
|-------------------------------|------------------|-----------------------|--------------------------------|
| DO-97-0530 | 97-173 | Andrews, Nancy | \$2,202.00 |
| DO-97-0402 | 97-193 | Andrews, Nancy | \$15.00 |
| DO-97-0530 | 97-160 | Andrews, Nancy | \$1,523.00 |
| DO-97-0367 | 97-131 | Andrews, Nancy | \$2,280.00 |
| DO-97-0402 | 97-081 | Andrews, Nancy | \$459.00 |
| DO-97-0402 | 97-103 | Andrews, Nancy | \$2,932.00 |
| DO-97-0367 | 97-120 | Andrews, Nancy | \$2,214.00 |
| Total: | | | \$11,625.00 |
| DO-97-0401 | 97-107 | Bray, K. | \$197 |
| DO-97-0401 | 97-080 | Bray, K. | \$306 |
| Total: | | | \$503 |
| DO-97-0367 | 97-105 | Condit, Thomas | \$9.96 |
| Total: | | | \$9.96 |
| DO-97-0367 | 97-105 | Cooper, Fred | \$124.00 |
| Total: | | | \$124.00 |
| DO-97-0530 | 97-173 | Davidson, Steven | \$89.89 |
| Total: | | | \$89.89 |
| DO-97-0367 | 97-105 | Devine, Richard | \$1,380.00 |
| DO-97-0367 | 97-120 | Devine, Richard | \$166.31 |
| Total: | | | \$1,546.31 |
| DO-97-0367 | 97-120 | Geller, Anna | \$96.20 |
| DO-97-0367 | 97-105 | Geller, Anna | \$749.00 |
| Total: | | | \$845.20 |
| DO-97-0367 | 97-105 | Gogol, Pamela | \$11.40 |
| Total: | | | \$11.40 |
| DO-97-0367 | 97-105 | Grove, Vicki Scott | \$1,347.00 |
| DO-97-0367 | 97-120 | Grove, Vicki Scott | \$215.74 |
| Total: | | | \$1,562.74 |
| DO-97-0367 | 97-127 | Hanson, Daniel | \$98.50 |
| DO-97-0367 | 97-105 | Hanson, Daniel | \$648.00 |
| DO-97-0367 | 97-120 | Hanson, Warren | \$118.10 |
| DO-97-0367 | 97-105 | Hanson, Warren | \$1,270.00 |
| Total: | | | \$2,134.60 |
| DO-97-0367 | 97-105 | Isimbabi, Michael | \$342.38 |
| Total: | | | \$342.38 |

**NAMS DELIVERY ORDER
TRAVEL COST ANALYSIS**

| Delivery Order No. | Voucher # | Sub-Contractor | Travel Amount (\$)* |
|-------------------------------|------------------|-----------------------|--------------------------------|
| DO-97-0367 | 97-078 | Klein, Joyce | \$650.24 |
| DO-97-0367 | 97-078 | Klein, Joyce | \$996.92 |
| DO-97-0367 | 97-078 | Klein, Joyce | \$627.00 |
| DO-97-0367 | 97-078 | Klein, Joyce | \$880.17 |
| DO-97-0367 | 97-078 | Klein, Joyce | \$882.12 |
| Total: | | | \$4,036.45 |
| DO-97-0367 | 97-078 | Lopez, Daniel | \$797.06 |
| Total: | | | \$797.06 |
| DO-97-0401 | 97-080 | Martin, B | \$1,550.04 |
| Total: | | | \$1,550.04 |
| DO-97-0367 | 97-078 | Miller, Diane | \$18.60 |
| Total: | | | \$18.60 |
| DO-97-0530 | 98-003 | Millner, Reece | \$18.32 |
| DO-97-0530 | 97-182 | Millner, Reece | \$36.64 |
| DO-98-0215 | 98-008 | Millner, Reece | \$19.56 |
| Total: | | | \$74.52 |
| DO-97-0367 | 97-105 | Mister, Melvin | \$279.00 |
| DO-97-0367 | 97-120 | Mister, Melvin | \$214.68 |
| Total: | | | \$493.68 |
| DO-97-0410 | 98-018 | Mullins, Richard | \$744.00 |
| Total: | | | \$744.00 |
| DO-97-0530 | 97-131 | Newberg, Jeremy | \$57.50 |
| DO-97-0367 | 97-131 | Newberg, Jeremy | \$57.50 |
| DO-97-0367 | 97-105 | Newberg, Jeremy | \$220.00 |
| Total: | | | \$335.00 |
| DO-97-0367 | 97-105 | Newell, Jamie | \$77.50 |
| DO-97-0367 | 97-131 | Newell, Jamie | \$117.50 |
| Total: | | | \$195.00 |
| DO-97-0367 | 97-127 | Okagaki, Alan | \$1,285.45 |
| DO-97-0367 | 97-105 | Okagaki, Alan | \$248.00 |
| Total: | | | \$1,533.45 |
| DO-97-0367 | 97-078 | Paquet, James | \$708.39 |
| Total: | | | \$708.39 |

**NAMS DELIVERY ORDER
TRAVEL COST ANALYSIS**

| Delivery Order No. | Voucher # | Sub-Contractor | Travel Amount (\$)* |
|-------------------------------|------------------|------------------------------|--------------------------------|
| DO-97-0401 | 97-121 | Puckett, L | \$37.05 |
| DO-97-0401 | 97-107 | Puckett, L. | \$124.00 |
| Total: | | | \$161.05 |
| DO-97-0367 | 97-100 | Pryde, Paul | \$2,127.30 |
| Total: | | | \$2,127.30 |
| DO-97-0410 | 97-194 | Raymond, James | \$1,818.19 |
| Total: | | | \$1,818.19 |
| DO-97-0367 | 97-105 | Reese, T. David | \$943.42 |
| Total: | | | \$943.42 |
| DO-97-0367 | 97-127 | Sandquist, Morgan | \$142.00 |
| DO-97-0367 | 97-105 | Sandquist, Morgan | \$459.00 |
| Total: | | | \$601.00 |
| DO-97-0367 | 97-105 | Schumpert, Thomas | \$588.65 |
| Total: | | | \$588.65 |
| DO-97-0401 | 97-080 | Semkow, C | \$1,894.64 |
| Total: | | | \$1,894.64 |
| DO-97-0367 | 97-120 | Silvis, Terry | \$81.75 |
| DO-97-0367 | 97-105 | Silvis, Terry | \$1,038.50 |
| Total: | | | \$1,120.25 |
| DO-97-0367 | 97-105 | Squire, Gary | \$2,032.00 |
| DO-97-0367 | 97-120 | Squire, Gary | \$154.00 |
| Total: | | | \$2,186.00 |
| DO-97-0530 | 97-173 | Swack, Michael | \$784.40 |
| DO-97-0530 | 97-173 | Swack, Michael | \$640.40 |
| DO-97-0530 | 97-173 | Swack, Michael | \$696.12 |
| Total: | | | \$2,120.92 |
| DO-97-0367 | 97-120 | Tansey, Charles | \$386.90 |
| DO-97-0367 | 97-105 | Tansey, Charles | \$124.00 |
| Total: | | | \$510.90 |
| DO-97-0367 | 97-105 | Turner, Robert | \$2,005.00 |
| Total: | | | \$2,005.00 |
| DO-97-0367 | 97-120 | Van-Vliet, Margaret Shephard | \$69.00 |
| DO-97-0367 | 97-105 | Van-Vliet, Margaret Shephard | \$802.00 |

NAMS DELIVERY ORDER
TRAVEL COST ANALYSIS

| Delivery Order No. | Voucher # | Sub-Contractor | Travel Amount (\$)* |
|--|-----------|----------------|------------------------|
| Total: | | | \$871.00 |
| DO-97-0401 | 97-080 | Ward, C | \$1,068.03 |
| Total: | | | \$1,068.03 |
| DO-97-0367 | 97-105 | Weiser, John | \$569.00 |
| DO-97-0367 | 97-120 | Weiser, John | \$83.00 |
| Total: | | | \$652.00 |
| DO-97-0367 | 97-084 | ? | \$24.80 |
| Total: | | | \$24.80 |
| *The travel amounts shown have not been audited. | | | |

EXHIBIT 14



COMMUNITY DEVELOPMENT
FINANCIAL INSTITUTIONS FUND

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

9/12/97

Bruce -

In addition to our other
topics, could ~~use~~ please
discuss renewal of contracts
at our admin meeting on
Thursday. I'm concerned if
we don't renew now, all
work ~~to~~ will stop on Sept
30th. Jerry Hauke has indicated
I should proceed with busi-
ness as usual. Thank


K.A.

EXHIBIT 15

Memorandum

To: Bruce Morgan

CC: Maurice Jones, Acting Deputy Director, CDFI Fund
Personnel File

From: Kirsten S. Moy,  Departing Director, CDFI Fund

Date: October 25, 1997

Re: Failure to Respond to Director's Calls for Clarification and Assistance Regarding Expiring Contracts and Other Matters

While I regret the need to address this matter in writing, your failure to return my phone calls thus far this week, my last week at the CDFI Fund, gives me no other way to communicate with you.

Several weeks ago I raised the issue of numerous contracts expiring at the end of October and asked that you take the necessary steps to enable me to sign off on whatever paperwork required before I left, so that the work of the Fund would not be disrupted by the unavailability of contractors whose contracts would expire at the end of the month. As you are aware, based not only on our conversations but your own knowledge of the workflow of the Fund, many of these projects are on very tight timelines.

While I authorized the training/course you attended the week of October 14th and the first two days of the past week, I had expectations that you (or any other manager) would make sure that critical responsibilities were covered in his/her absence. And while you called in sick the three days following the training session, I must confess it is difficult for me to understand how you could fail to return a phone call to your superior, especially given my imminent departure and the importance of the matters regarding which I called: the expiring contracts and the completion of workplans which I indicated I needed to give to Under Secretary Hawke.

The Under Secretary is expecting a set of workplans on Monday (10/27/97) and has been alerted to the possibility of delays in the work schedule as a result of contract-related issues. In the interest of minimizing future disruption, I would suggest you meet with Maurice as quickly as possible on the issue of the expiring contracts, as well as to go over your workplans.

EXHIBIT 16

8(a) CONTRACT LEGAL REVIEW

8(a) Contractor Nike American, not same one Procuring Agency: Treasury
 Prime Contract #: _____ Subcontract #: 45 The contract has been reviewed and is legally sufficient as to the following:

| | |
|--|-----------|
| <input checked="" type="checkbox"/> Prime Clauses | 52.219.11 |
| <input checked="" type="checkbox"/> Subcontract Clauses | 52.219.12 |
| <input checked="" type="checkbox"/> Limitation on Subcontracting | 52.219.14 |
| <input checked="" type="checkbox"/> Tripartite Clauses | 52.219.17 |
| <input checked="" type="checkbox"/> Procurement Integrity | 52.203-8 |
| <input checked="" type="checkbox"/> Anti-Lobbying | 52.203-11 |

☒ (1) The procuring agency has indicated that funding for the contract is available. Contracting authority is indicated.

☒ (2) The proper special 8(a) provisions have been inserted into the prime and subcontracting documents. (If a tripartite agreement is being used, the proper 8(a) clauses have been inserted into such document).

N/A (3) If applicable, any contract specific clauses that the procuring agency seeks to insert into the contract have been reviewed and found to be legally acceptable. (Non-FAR Clauses)

☒ (4) The proper names appear on the contract documents (e.g., the legal name of the 8(a) contractor must appear on the contract documents, no the "doing business as" name).

☒ (5) The BOS has made written determination that adverse impact on the business programs or individual small businesses does not exist, where such determination is required under 13 CFR 124.309(c) and SOP 80 05 2. That statement is supported by the documentation in the file.

☒ (6) The file reflects that a SIC Code designation has been made by the procuring activity (if the solicitation does not contain a SIC Code designation, correspondence expresses the procuring agency's views concerning the appropriate SIC Code for the requirement).

☒ (7) The BOS has indicated that the SIC Code designated for the procurement, SIC 2741 is appropriate at the time of acceptance of the requirement.

(8) For sole source 8(a) contract:

☒ (a) If SBA authorized the procuring activity to conduct negotiations with the 8(a) Participant. The file contains the procuring activity's memorandum of negotiations (which has been reviewed by the Contract Specialist) or a statement from the SBA Contract Specialist that the negotiated price is fair and reasonable until such time that a memorandum of negotiations is received from the procuring activity and a memorandum of negotiations of the SBA Contract Specialist.

N/A (b) If SBA participates in the negotiation process, the file contains the procuring activity's memorandum of negotiation (which has been reviewed by the Contract Specialist) or a statement from the SBA Contract Specialist that the negotiated price is fair and reasonable until such time that a memorandum of negotiations is received from the procuring activity and a memorandum of negotiations of the SBA Contract Specialist.

N/A (9) For competitive 8(a) contracts, the BOS has made a written determination that the 8(a) contractor is eligible for award.

☒ (10) The 8(a) contractor's initial proposal which includes price contains a written certification by the 8(a) contractor that the concern is small under the size standard corresponding to the SIC Code determined to be appropriate for the 8(a) contract.

☒ (11) The BOS, as appropriate, has verified the size certification. Verification must occur after certification.

☒ (12) The 8(a) contractor agreed in the proposal to perform the required percentage of work with its own labor force.

☒ (13) If the 8(a) contractor is in the transitional stage of program participation, the contractor has certified that it is in compliance with the applicable non-8(a) business activity target or any remedial measure(s) imposed by SBA pursuant to 124.312(c) (12) of SBA's regulations (provided that the remedial measures allow for the continued award of 8(a) contractors).

This determination regarding legal sufficiency takes into account the legal adequacy of the documentation cited above based on FAR and Agency regulation and instruction.

Pursuant to Regional policy, this review is confined to the topics set forth herein. Other legal requirements which must be complied with prior the award of a contract have not been covered by this review and no opinion is expressed or implied with respect to such requirements.

[Signature]
 SBA Counsel

3-14-97
 date

(Attach to SBA Form 1016)
 SBA Form 1732

IDIQ

Need C.S. to
 sign properly
 27 ok
 Subcontracting
 Certification

EXHIBIT 17

FEF-12-1996 16-01 CDFI Fund 202021107 1.07

Date: August 14, 1997

To: Bruce Morgan
From: Don Bard *DB*

Subject: Impact recent administrative actions have had on the CDFI Fund

Reference is made to our earlier discussions concerning the state of affairs at the CDFI Fund as a result of the Director and Deputy Director announcing their departure. As previously noted, due to the very serious situation that has occurred at the Fund, it is imperative that appropriate actions be taken to protect the Fund from any further condemnation. In addition, I have personally seen the morale of the staff deteriorate during the past several months and have overheard some discussions questioning who is in charge. I therefore offer the following observations and suggestions to begin to address these concerns.

First, an individual, preferably one who is currently on staff, familiar with the CDFI Fund, and who will be around after the current Director leaves, should be placed in charge of the Fund. This should be done as soon as possible. This individual would be given the authority to make all decisions on matters relating to personnel as well as the awarding of all grants and other federal assistance until a permanent Director is selected. (Not only from a government's perspective is it not a good practice to have someone who will be leaving make decisions for the agency, especially one who is leaving as a result of "poor judgment," but from a business practice it is almost unheard of.)

Second, I have seen assignments that should be given to program staff be assigned to consultants, while at the same time work that is more appropriate that consultants do, be given to program staff. Furthermore, it appears that decisions that should be made by program staff are being made by consultants. (With more than 28 years with the Federal Government, I have never seen or heard of such things taking place.) However, the real concern is that once the consultants leave, the responsibility will fall on staff to reconcile and defend actions made by "outsiders." Therefore, it would be appropriate that the current role of all consultants be examined, and where appropriate, all decision actions revert back to program staff.

On July 10th, (copy attached) I provided a memorandum to the Director pointing out several major concerns that needed to be addressed prior to completing the second round of funding. My concern here is that many of the problems experienced in the first round appear to be repeating in this latest cycle. I surmise that almost all could be avoided if appropriate actions are taken. However, to date I have seen little to demonstrate that those mistakes previously made will not be repeated.

Although I realize that these matters are beyond your authority to resolve, I felt that it is important to document my observations and suggestions at this time. I am prepared to further discuss the particulars at your earliest opportunity.